

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TIMOTHY D. KANE, )  
                        )  
                        )  
Plaintiff,         )  
                        )  
                        )  
v.                     )      Case No. 07 C 6590  
                        )  
                        )  
RAYMOND GILBERT and )      Magistrate Judge Maria Valdez  
JOSEPH PAAVILAINEN, )  
                        )  
                        )  
Defendants.         )

**NOTICE OF MOTION**

TO: Mr. Gary L. Gassman  
Meckler, Bulger & Tilson, LLP  
123 North Wacker Drive  
Suite 1800  
Chicago, IL 60606

PLEASE TAKE NOTICE that on Tuesday, July 15, 2008 at 9:30 a.m., the undersigned will appear before the Hon. Maria Valdez in Room 1300 of the Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois and then and there present the motion of defendants for Leave to Take Deposition, a copy of which is served upon you herewith, and ask for hearing instanter.

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s/ Daniel P. Field

Daniel P. Field  
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**CERTIFICATE OF SERVICE**

Daniel P. Field, an attorney, certifies that on July 9, 2008, he filed the Defendants' Motion For Leave To Take Deposition with the clerk of court using the CM/ECF system which will send notification of such filing to the following:

Mr. Gary L. Gassman

[gary.gassman@mbtlaw.com](mailto:gary.gassman@mbtlaw.com)

s/ Daniel P. Field